

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT HUNTINGTON

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:22-CR-00087

ALEX KAI TICK CHIN

MOTION OF UNITED STATES TO  
PERMIT VIDEOCONFERENCE TESTIMONY

Comes now the United States of America by Jennifer Rada Herrald, Assistant United States Attorney for the Southern District of West Virginia, hereby files this motion requesting the Court's permission to allow witnesses to testify at the March 20, 2023, pretrial motions hearing by video.

Defendant has filed a motion to suppress evidence seized by Customs and Border Protection and Homeland Security Investigations from defendant at the border crossing in El Paso, Texas. Defendant also moves to suppress statements made to Customs and Border Protection. Some of the allegations in the motion will require testimony regarding the conditions under which defendant provided his statement and the passcode to his phone. All of the relevant witnesses are located at or near El Paso, Texas.

The United States requests that these witnesses be allowed to testify by video, particularly given that some of them will likely have to travel for trial two weeks later. The undersigned has

conferred with defense counsel, who represented that he had no objection to the witnesses testifying by video for the hearing.

Therefore, in order to the unnecessary expense of travel and to avoid any travel-related delays that could delay the pretrial motions hearing, the United States respectfully requests that any witnesses from Texas be permitted to testify by video.

Respectfully submitted,

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United States Attorney

/s/Jennifer Rada Herrald  
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**CERTIFICATE OF SERVICE**

It is hereby certified that the foregoing "MOTION OF UNITED STATES TO PERMIT VIDEOCONFERENCE TESTIMONY" has been electronically filed and service has been made on opposing counsel by electronic mail this the 7th day of March, 2023, to:

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